UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF VIRGINIA LYNCHBURG DIVISION

GEBO CERMEX USA, INC., a Georgia corporation, GEBO CERMEX CANADA INC., a Canadian corporation and GEBO PACKAGING SOLUTIONS FRANCE S.A.S., a French corporation,

Civil Action No. : 6:18CV00080-NKM-RSB

Plaintiffs,

V.

ALLIANCE INDUSTRIAL CORPORATION, a Virginia corporation,

Defendant.

PLAINTIFFS' UNOPPOSED MOTION TO SUBSTITUTE COUNSEL

Plaintiffs Gebo Cermex USA, Inc., a Georgia corporation, Gebo Cermex Canada Inc., a Canadian corporation and Gebo Packaging Solutions France S.A.S., a French corporation (collectively "Gebo") file this motion requesting this Court enter any Order permitting the withdrawal of its counsel of record, Michael Sloan and Rhonda Overstreet, and the appearance of substitute counsel, Joshua F. P. Long, and Joseph Walton Milam, III of Woods Rogers PLC, on their behalf in this action. In support of this Motion, Gebo states as follows:

Joshua F. P. Long and Joseph Walton Milam, III have been retained to 1.

represent Gebo in this matter, each of whom is admitted to practice in the State of

Virginia and in the U.S. District Court for the Western District of Virginia.

2. Gebo approves of this substitution.

3. This Motion is not brought for delay, but to allow Gebo to be

represented by counsel of their choice.

Defendant Alliance Industrial Corporation does not oppose this 4.

Motion.

Gebo moves this Court for entry of the attached Order allowing the

withdrawal of Michael Sloan and Rhonda Overstreet and the substitution of Joshua

F. P. Long, and Joseph Walton Milam, III of Woods Rogers PLC as it's counsel of

record in this action, updating the Court's records and ECF system to reflect these

changes, and directing all future communications regarding this case to the

following:

Joshua F. P. Long, Esq. (VSB No. 65684)

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2

This 6th day of January, 2020

Respectfully submitted,

/s/ Robert Hart
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Attorneys for Plaintiffs Gebo Cermex USA Inc., Gebo Cermex Canada Inc., and Gebo Packaging Solutions France S.A.S.

CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing with the Clerk of Court using the CM-ECF System, which will send a notification of such filing (NEF) to counsel of record.

This the 6th day of January 2020.

Respectfully submitted,

/s/ Robert Hart
Robert Hart (Pro Hac Vice)

Attorneys for Plaintiffs Gebo Cermex USA Inc., Gebo Cermex Canada Inc., and Gebo Packaging Solutions France S.A.S.